

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services)	CC Docket No. 98-67
And Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	

**REGISTRY OF INTERPRETERS FOR THE DEAF
COMMENTS ON SPEED OF ANSWER REQUIREMENT FOR VRS**

The Registry of Interpreters for the Deaf, Inc. (RID), is the national professional association of sign language interpreters. We represent well over 20,000 members at the local, state and national levels. This number includes certified and non-certified interpreters, retired interpreters, supporting members not engaged in interpreting, and students of interpreting. RID provides the following comments in response to FCC Public Notice (CC Docket 98-67; CG Docket 03-123) seeking additional comment on the Speed of Answer requirement for Video Relay Service (VRS).

RID is in support of VRS calls being answered in a reasonable period of time. VRS services should be fair and equitable to all citizens; deaf and hearing. The speed of answering calls should be reasonable and the rate of reimbursement should be such that providers can employ fully qualified, certified interpreters for this vital service. However, RID is concerned that the current number of certified, qualified interpreters is well below the number required to adequately and safely provide quality VRS service.

The crisis in the quantity, quality and qualifications of interpreters dates back to the joint declaration (1996) by the National Association of the Deaf, Inc. (NAD) and RID that a national shortage of interpreters exists. This crisis affects all deaf citizens needing interpreting services for medical appointments, business meetings, court appearances and now VRS.

In specific response to questions posed by the FCC, RID provides the following comments:

1. What should the speed of answer time be for VRS calls? What percentage of VRS calls should be required to be answered within that period of time?

RID supports a standard for speed of answer that would be similar in time and percentage to that of TRS, provided that adequate funding to relay centers in order to ensure adequate numbers and quality of interpreters is available. RID would support a phased-in

timeline of several years to achieve this standard. The task of interpreting VRS calls is highly stressful and exposes interpreters to ergonomic inefficiencies and potential for repetitive motion injury; an interpreter's career can be severely shortened if not ended by these injuries.

2. When should a particular speed of answer rule be effective? Should VRS speed of answer standards be phased in over time? If so, how should the standards be phased in (i.e., what standards should apply at what points in time)?

RID recommends that speed of answer standards be phased in over a period of time so that the supply constrained workforce can be addressed through career training. RID envisions a multi-year approach and recommends the FCC partner with Interpreter Training Programs (ITP's) by setting aside training and career development funds. These funds would be used to develop specialized video interpreting training for entry level and career interpreters. It is important to note that some graduates of ITP's may not be able to effectively interpret VRS calls immediately upon graduation and may require as many as two or more years of further experiential training..

3. What should be the starting and ending points for measuring speed of answer?

While RID supports measurement of speed of answer, RID believes that improved data collection and technology must be implemented. RID believes the standard of measurement must be fair and reasonable so that interpreters are not unreasonably held responsible for technology outside of their realm of control. RID believes that providers may have used or be using reward systems relating to speed of answer. The FCC must ensure that any reward or disciplinary system utilized by providers is fair and equitable in so much as the interpreter may not be directly responsible for increased speed of answer times.

4. How should "abandoned" calls be treated in determining a provider's compliance with a speed of answer standard?

RID is in support of adequate funding and staffing of VRS call centers. RID believes that abandoned calls can be addressed by increased staffing and funding to providers.

We note that the TRS regulations presently require that abandoned calls be included in the speed of answer calculation. Should the same rule apply to VRS and abandoned calls? If not, what other rule should apply to the treatment of abandoned calls?

RID does not support inclusion of abandoned calls in the VRS speed of answer calculation. The Internet Protocol is highly susceptible to dropped calls due to a number of factors, including packet loss. VRS relies on technology still in its early development and does not currently have the same fault tolerance which exists in PSTN connections.

5. How should "call backs" - i.e., calls where the consumer elects to have the provider call the consumer back when a VRS CA becomes available to place the call, rather than have the consumer wait for the next available CA - be treated in the speed of answer

calculation? Should, for example, such "call backs" be treated as abandoned calls? Should such "call backs" be prohibited once a speed of answer rule is adopted for VRS?

The FCC is mandated to apply flexible regulations regarding new and early adoption of a technology when greater functional equivalence may be achievable. RID views "call backs" as a service provided which may benefit VRS consumers. Call backs could be viewed similarly to non-shared language calls which are not required but may be provided. A supply constrained service should implement creative options which are offered as a choice to citizens. RID does not support "call backs" in lieu of appropriate call handling processes in so much that a citizen would be denied VRS if the call were not scheduled or a "call back" setup. Clearly, RID seeks a functionally equivalent service where interpreters are able to perform their duties safely and without risk of injury.

6. Should a provider's compliance with a speed of answer rule be measured on a daily or monthly basis? Or should it be measured on some other basis?

RID does not have sufficient data to form an opinion at this time. RID would ask to reserve the right to provide comment at a later time if sufficient data were to become available.

7. In connection with the adoption of a speed of answer requirement for VRS, should providers be required to submit reports to the Commission detailing call data reflecting their compliance with the speed of answer rule, and if so, how frequently should such reports be filed (e.g., monthly, quarterly or semi-annually)?

RID believes a semi-annual reporting requirement would be prudent.

RID would like to reiterate previous comments to the FCC for emphasis. RID strongly urges the FCC to require VRS interpreters to hold valid RID certification, including the NAD-RID National Interpreter Certification (NIC) or valid NAD certification. The RID testing system is a psychometrically validated knowledge and performance test. The generalist certificates provide a minimum baseline skill set. As stated previously, the RID is in support of requiring the legal specialist certificate for VRS calls of a legal nature. The complex communication exchanged between two parties, especially when one party is a legal professional, requires specialized vocabulary and language skills to effectively interpret the call. The vocabulary and language skills necessary to effectively interpret both expressively and receptively calls of a legal nature are inherent to interpreter's who hold the RID specialized legal certificate.

The RID believes there is sufficient cause for the FCC to implement regulations requiring minimum certification standards similarly that TRS CA's who provide text relay are held to certain minimum standards of performance. The national testing system of RID is considered the premier skill and knowledge measurement available in the interpreting profession.

The RID fully supports the Public Notice reminding the public that VRS should not be used as Video Remote Interpreting (VRI).